

Exhibit 10

2 make clear that all the questions I'm going to
3 ask you about different offerings are
4 related, I want you to answer only up until
5 the point that Mr. Lima left the business in
6 -- and resigned from IBM.

7 What about office 365, what was the
8 answer on that?

9 A. No, we don't have an offering for
10 office 365.

11 Q. What about a gaming platform.
12 What does IBM offer?

13 A. We don't offer anything on gaming.

14 Q. And do you know how big a part of
15 the business for Microsoft gaming and gaming
16 in the cloud is?

17 MR. SIGNORACCI: Object to form you
18 may answer.

19 A. I don't know.

20 Q. What about V R. Virtual reality,
21 what is your offering on that, up to the
22 point when he left?

23 A. Virtual reality we have some
24 offerings on that, actually a platform on the
25 cloud, a power platform is very good in this

2 Q. Are you on the client experience
3 team?

4 A. Yes.

5 Q. And do you know at the time that
6 Mr. Lima resigned or at any time in 2020,
7 after his job changed you was he on the
8 client experience team?

9 A. No.

10 He was the previous year because he
11 presented to me a very good work that he was
12 doing in the client experience team in that
13 year and these things are rotationnal, you
14 spend one year, you leave, and other people
15 come for the next year so we give people
16 experience of. Executive, I remember he was
17 last year and he did a very good project
18 around booster was the name.

19 About improveing the quality and
20 grievances of clients.

21 Q. So in 2020 though eMoved to become
22 the head of the integrated accounts; correct?

23 A. Yes.

24 Q. Which is the top 77 clients of IBM;
25 correct?

2 A. Yes.

3 Q. And each one of those top 77
4 clients has an individual that has
5 responsibility for that account, that is, was
6 not Mr. Lima, correct?

7 A. Mr. Lima was the leader of those 77
8 managing directors that we call them.

9 Q. So, was it one managing director
10 for each integrated account that had
11 responsibility?

12 A. Yes.

13 Q. Over it some sometimes they had
14 multiple, one?

15 A. No, one every -- every account had
16 one managing director.

17 Q. And Mr. Lima was at the top of that
18 pyramid and those 77 individuals with client
19 responsibility for the top 77 accounts
20 reported to him; correct?

21 A. Yes.

22 Q. Okay.

23 Can you tell us whether in 2020,
24 after he was put in the job, Mr. Lima had
25 direct contact with a single one of the 77